

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRANK LIU,

Plaintiff,

v.

THE NIELSON COMPANY (US) ET AL.,

Defendants.

Case No. 1:22-cv-09084(JHR)

Judge Jennifer H. Rearden

**DECLARATION OF CAITLIN W. TRAN IN SUPPORT OF DEFENDANTS THE
NIELSEN COMPANY US LLC AND TNC US HOLDINGS' MOTION TO DISMISS**

I, Caitlin W. Tran, declare as follows:

1. I am an adult over the age of eighteen, make this declaration based upon my own personal knowledge, and am competent to testify to the facts set forth below.

2. I am an attorney admitted to practice law in California. My application to represent Defendants The Nielsen Company US LLC and TNC US Holdings (“Defendants”) *pro hac vice* in this matter was granted on April 10, 2023 (Dkt. 26).

3. Attached as Exhibit 1 is a true and correct copy of the Charge of Discrimination filed by Plaintiff with the Florida Commission on Human Relations Office on September 25, 2019.

4. Attached as Exhibit 2 is a true and correct copy of the Complaint filed against Defendants in the United States District Court for the Northern District of California, Case No. C21-07313-JSW, dated September 20, 2021.

5. Attached as Exhibit 3 is a true and correct copy of the Judgment dismissing Plaintiff’s action, without prejudice, dated September 23, 2022, in his case previously pending in the United States District Court for the Northern District of California Case No. C21-07313-JSW.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 22, 2023.

By: /s/ Caitlin W. Tran
Caitlin W. Tran